Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Amendment of Part 97 of the Commission's	**)**	
Rules to Facilitate Use in the Amateur	**)**	
Radio Service of Single Slot Time Division	**)**	**RM-11625**
Multiple Access Telephony and Data	**)**	
Emissions	**)**	
	)	

To the Commission:

You have before you likely one of the most important filings in recent years concerning ham radio. As in the past when continuous wave transmissions were the mainstay of ham communications and the advent of more advanced technologies such as single-sideband modes were conceived and deployed, we have here a similar scenario where advanced digital technologies have been conceived and are in the process of being deployed. Consideration for allowance and implementation should be given towards these new technologies as they have been in the past.

Arguments for DMR type emissions can be made in a similar fashion and a similar context as an argument for DMR in commercial deployments sans consideration for profitable operations. Spectrum efficiency is key and likely will result in more robust ham band utilization. Further, the use of data related features, such as geo-location, will likely result not only in more advanced applications for daily use but has the potential for life-saving implementation as well.

Consideration should be given not only to TDMA (Motorola) technology but to other potential digital technologies now and in the future. FDMA technology such as NexEdge (Kenwood & Icom) and other emission types should have reasonable accommodation in a re-work of Part 97 as applicable. It is important to note the basic premise of ham radio – ham radio's purpose, among other things, is to promote the experimentation of new modes and techniques. Ham radio is perfectly suited to accomplish this and the best interests of the intent thus are met. It should be noted that Icom's D-STAR system is currently deployed and in general use and shares much of the same operating characteristics as DMR type technologies. Thus, in a sense, there is already precedence for narrowband digital modes in the ham bands.

I would urge the Commission to duly consider and adopt the necessary changes to accommodate these new technologies and cause a re-write of Part 97 to allow for other unconceived technologies that may come along in the future consistent with the intent and certain other requirements that pertain to ham radio operations.

Thank you for your consideration in this matter.

Steve Cohan, KF0RW
Greenwood Village, Colorado